

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

Case No: 18-23538 (RDD)

Chapter 11

(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF MICHAEL M. MULDER IN
SUPPORT OF THE APPLICATION OF THE OFFICIAL
COMMITTEE OF RETIREES WITH LIFE INSURANCE BENEFITS
OF THE SEARS HOLDINGS CORPORATION, ET AL. TO RETAIN
AND EMPLOY WOLLMUTH MAHER & DEUTSCH LLP AS
COUNSEL, NUNC PRO TUNC TO JULY 9, 2019**

Under 28 U.S.C. § 1746, I, Michael M. Mulder, declare as follows under the penalty of perjury:

1. I am an attorney admitted to practice in the State of Illinois and have filed a motion for admission to practice, *pro hac vice*, in this matter through association with a member of this Court. (ECF 4150)
2. I am a partner of the firm of The Law Offices of Michael M. Mulder (“MMM” or the “Firm”). MMM maintains offices at 1603 Orrington Avenue, Suite 600, Evanston, Illinois 60201. There are no disciplinary proceedings pending against me.
3. I am familiar with the matters set forth herein and make this declaration (the “Declaration”) in support of the application (the “Application”)¹ of the Official Committee of Retirees With Life Insurance Benefits (the “Retirees Committee”) of Sears Holdings Corporation and its affiliated debtors and debtors in possession (collectively, the “Debtors”) authorizing and

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

approving the Retirees Committee's retention and employment of WMD as counsel to the Retirees Committee.

4. The Office of the United States Trustee has requested that the Firm disclose the amount of fees and expenses incurred for its work on behalf of two individual creditors in this case. Specifically, prior to the formation date of the Retirees Committee, the Firm represented Richard Bruce and Ronald Olbrysh individually in their successful efforts to have a committee appointed. During that approximate two-month period, roughly \$59,979.00 in fees were billed or incurred.

5. MMM billed at its customary hourly rates as set forth below, for the preformation work and intends to file an application seeking a substantial contribution claim.

<u>Billing Category</u>	<u>Hourly Rate</u>
Partners	\$ 900
Associates	\$ 690
Paraprofessionals	\$ 240

6. The names, positions and 2019 hourly rates of the MMM attorneys currently expected to have primary responsibility for providing services to the Retirees Committee are as follows:

<u>Attorney</u>	<u>Position</u>	<u>Hourly Rate</u>
Michael M. Mulder	Partner	\$ 900
Elena N. Liveris	Associate	\$ 690

I declare under penalty of perjury that the foregoing is true and correct on this 23rd day of August 2019.

/s/ Michael M. Mulder

Michael M. Mulder